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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JOHN A. HOUSTON)

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL EDWARD CHOVAN,

Defendant.

CASE NO.: 10CR1805-JAH

DATE: June 21, 2010

TIME: 10:30 a.m.

NOTICE OF MOTIONS AND MOTIONS TO:

1) Grant Bail Pending Appeal

TO: LAURA DUFFY, UNITED STATES ATTORNEY, AND
CAROLINE HAN, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on March 21, 2011, at 8:30 a.m., or as soon thereafter as counsel may be heard, defendant, Daniel Edward Chovan, by and through his attorneys, Joshua J. Jones and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

MOTIONS

Defendant, Daniel Edward Chovan, by and through his attorneys, Joshua J. Jones and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

(1) Grant Bail Pending Appeal

10CR1805-JAH

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: March 2, 2011

s/ Joshua J. Jones
JOSHUA J. JONES
 Federal Defenders of San Diego, Inc.
 Attorneys for Mr. Chovan
Joshua_Jones@fd.org

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)
)
Plaintiff,) Case No. 10CR1805-JAH
)
v.)
) **CERTIFICATE OF SERVICE**
 DANIEL EDWARD CHOVAN,)
)
Defendant.)
_____)

Counsel for Defendant certifies that the foregoing pleading, is true and accurate to the best of her information and belief, and that a copy of the foregoing has been electronically served this day upon:

CAROLINE HAN, ASSISTANT UNITED STATES ATTORNEY

mailed to: Mr. Chovan

Dated: March 2, 2011

/s/ Joshua J. Jones
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